

Via Electronic and Certified Mail

March 6, 2015

Mr. Stephen Tzhone, Superfund Remedial Project Manager
Superfund AR/LA Enforcement Section (6SF-RA)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

Subject: Monthly Progress Report – February 2015
Arkwood, Inc. Site, Omaha, Arkansas

Dear Mr. Tzhone:

Pursuant to Section IX (B) of the corrected Consent Decree in this matter, the following letter report is Millbrook Distribution Services' (MMI) monthly progress report.

I. CURRENT ACTIVITIES

The following is a general description of Work (as defined in the Consent Decree) activities commenced or completed during this reporting period:

During February, we operated the main water treatment system, collected operational samples and conducted Site maintenance activities. In addition to collecting samples for laboratory analysis of pentachlorophenol, field samples were collected to measure pH, temperature and dissolved oxygen. Water samples were collected on February 11, 2015. The analytical data was forwarded electronically to you and Mr. Mark Moix of the ADEQ at an earlier date and is also attached to this report. A summary of the data is attached for reference. Samples at the spring mouth and weir will continue to be collected once per month until a reduction in frequency is approved by the agency.

We continued to receive analytical data during February associated with the dioxin reassessment and supplemental dye tracing study. Also, the 2014 Annual Report was submitted on February 26, 2015.

II. PROJECT DATA

Attached.

III. PROJECTED ACTIVITIES

March: MMI plans to continue ongoing operations and Site maintenance activities. Reports presenting the results from the dioxin reassessment soil sampling (Decision Unit Plan and Sampling) and supplemental dye tracing will be prepared and submitted by March 31, 2015. In addition, the limited sections of the ditch that remain uncovered downgradient of the main water treatment system will be enclosed in a subsurface culvert. This will eliminate exposure to the treated water and sediment between the treatment plant and the detention pond, as discussed during the site visit last fall.

April: MMI plans to continue ongoing operations and Site maintenance activities.

May: MMI plans to continue ongoing operations and Site maintenance activities.

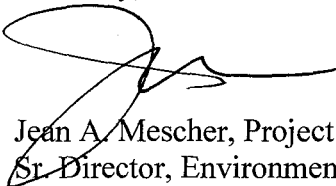
IV. PROBLEMS ENCOUNTERED OR ANTICIPATED

None.

I certify that the information contained in or accompanying this submission is true, accurate, and complete to the best of my knowledge, information and belief, and that I, as project coordinator, have made reasonable inquiry into its veracity.

If you have any questions regarding this monthly progress report, please do not hesitate to contact me at (608) 848-4134.

Sincerely,



Jean A. Mescher, Project Coordinator
Sr. Director, Environmental Services

Enclosure

Copy:

- Mark Moix, ADEQ
- EPA Assistant Regional Counsel (6C-WA) (w/o enclosure)
- Chief, Superfund Enforcement Branch (6H-E) (w/o enclosure)

Arkwood, Inc. Site: Ozone Injection Pilot Study

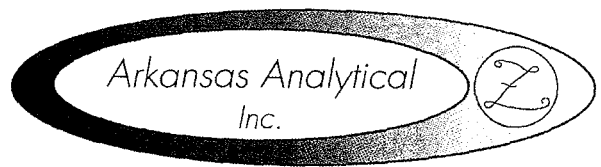
Date	Variables		Spring	PCP	
	Water Inj	O3 Inj	Flow	Mouth	Weir
12/8/05			5		
12/9/05	35		5		
12/14/05	35	1lb/10 g	21	28	
12/15/05	35	1lb/10 g	30/27	29.3	
12/20/05	36	1lb/10 g	27	7.39	<5.10
12/26/05	36	1lb/10 g	27	11.4	11.1
1/2/06	36	1lb/10 g	21	42.4	35.1
1/9/06	36	1lb/10 g	20	32.4	33
1/16/06	36	1lb/10 g	27.5	32.3	<5.00
1/23/06	36	1lb/10 g	34/32	15.9	<5.00
1/30/06	36	1lb/10 g	41	34.3	<5.00
2/6/06	36	1lb/10 g	38	<5.10	<5.00
2/13/06	36	1lb/10 g	34	23.9	<5.00
2/20/06	36	1lb/10 g	21	5.53	4.19J
2/27/06	36	1lb/10 g	26	19.9	<5.00
3/6/06	34	1-2lb/10 g	16	25.1	<5.00
3/13/06	33	1-2lb/10 g	57	107	<5.00
3/20/06	32	1-2lb/10 g	48	26.2	<5.00
3/27/06	32	1-2lb/10 g	27	4.09J	<5.00
4/3/06	34	2-3lb/10 g	24	11.3	<5.00
4/10/06	33	2-3lb/10 g	16.4	39.3	<5.00
4/17/06	34	2-3lb/10 g	22	7.94	7.82
4/24/06	35	2-3lb/10 g	16	7.0	<5.00
4/27/06	33	2-3lb/10 g	50	11.3	NA
4/29/06	33	2-3lb/10 g	193	28.2	NA
5/1/06	33	2-3lb/10 g	94	23.4	7.16
5/8/06	33	2-3lb/10 g	59	52.3	23.3
5/15/06	34	2-3lb/10 g	21.7	14.9	<5.00
5/22/06	34	2-3lb/10 g	16	<5.00	<5.00
5/30/06	34	2-3lb/10 g	16.7	5.64	<5.00
6/7/06	0	0	3	253	<5.00
6/12/06	0	0	2.19	LE	LE
6/19/06	34	0	16.7	52.1	14.3
6/26/06	34	0	16.7	74.7	<5.00
7/5/06	35	0	21.7	9.8	<5.00
7/17/06	34	0	16.7	21.9	4.01J
8/7/06	34	0	16.7	23.6	18
8/14/06	34	0	16.7	<5.00	5.22
9/5-6/06	34	0	23	6.57	<5.10
9/18/06	34	0	24	6.29	<5.00
10/2/06	34	0	24	16.8	<5.00
10/16/06	34	2-3lb/10 g	41	39.6	2.22J
10/16/06	34	5-6lb/10g	81	92.3	19.4
10/18/06	34	5-6lb/10g	27	118	<5.00
11/7/06	35	2-4lb/10g	41	52.7	4.70J
11/20/06	35	2-4lb/10g	24	57.4	<5.00
11/30/06	35	5-6lb/10g	636	<50.0	<5.00
12/4/06	35	5-6lb/10g	59	<54.3	<5.00
12/6/06	35	5-6lb/10g	37	<52.6	<5.00
12/18/06	35	2-3lb/10 g	21	24.1	<5.00
1/8/07	35	2-3lb/10 g	21	16.7	<5.00
1/22/07	35	2-3lb/10 g	79	34.6	<5.00
2/5/07	35	2-3lb/10 g	27	25.9	<5.00
2/19/07	35	2-3lb/10 g	47	19.6	<5.00
3/5/07	35	2-3lb/10 g	27	<5.00	<5.00
3/19/07	35	2-3lb/10 g	25	NA	NA
4/9/07	35	2-3lb/10 g	23	<5.00	<5.00
4/23/07	35	2-3lb/10 g	30	7.27	<5.00
5/7/07	35	2-3lb/10 g	21	2.90J	<5.00
5/21/07	35	2-3lb/10 g	20	4.36J	<5.00
6/4/07	35	2-3lb/10 g	20	<5.00	<5.00
6/18/07	35	0	21	9.62	<5.00
7/9/07	35	0	20	15.0	<5.00

7/23/07	35	0	18	8.65	<5.00
8/6/07	0	0	1	191	9.19
9/10/07	35	0	23	217	26.4
9/24/07	35	0	18	16.2	19.4
10/10/07	35	2-3lb/10g	18	5.63	1.15J
10/22/07	35	2-4lb/10g	18	1190	53.7
11/5/07	35	2-4lb/10g	18	209	7.93
11/19/07	35	2-4lb/10g	18	19.8	24.1
12/3/07	35	2-4lb/10g	18	20.1	<5.00
12/17/07	36	2-4lb/10g	32	87.4	1.20J
1/7/08	36	2-4lb/10g	23	<5.00	<5.00
1/21/08	36	2-4lb/10g	23	58	<5.00
2/4/08	36	2-4lb/10g	24	52	<5.00
2/18/08	35	2-4lb/10g	83	57	15
3/3/08	35	5-6lb/10g	580	<5.00	<5.00
3/17/08	35	5-6lb/10g	44	11	<5.00
4/7/08	35	5-6lb/10g	78	10	<5.00
4/12/08	35	5-6lb/10g	240	6.5	NA
4/13/08	35	5-6lb/10g	100	6.8	NA
4/14/08	35	5-6lb/10g	78	8.2	NA
5/10/08	36	5-6lb/10g	68	75	<5.00
5/27/08	0	0	18	189	<5.00
6/9/08	35	2-4lb/10g	30	77	<5.00
6/23/08	35	2-4lb/10g	580	5.6	<5.00
7/7/08	35	2-4lb/10g	80	194	189
7/10/08	35	5-6lb/10g	140	254	20
7/21/08	35	5-6lb/10g	42	477	<5.00
8/4/08	35	2-4lb/10g	22	108	14
8/18/08	35	2-4lb/10g	36	31	<5.00
9/1/08	35	2-4lb/10g	25	32	<5.00
9/22/08	35	2-4lb/10g	40	22	<5.00
10/6/08	35	2-4lb/10g	21	20	<5.00
10/20/08	33	2-4lb/10g	21	13	<5.00
11/3/08	35	2-4lb/10g	24	<5.00	<5.00
11/17/08	35	2-4lb/10g	30	28	<5.00
12/1/08	35	2-4lb/10g	24	12	<5.00
12/22/08	33	2-4lb/10g	24	<5.00	<5.00
1/5/09	35	2-4lb/10g	32	7.3	<5.00
1/26/09	32	2-4lb/10g	27	<5.00	<5.00
2/9/09	33	2-4lb/10g	90	<5.00	<5.00
2/23/09	33	2-4lb/10g	31	6	<5.00
3/9/09	34	2-4lb/10g	30	5.7	<5.00
3/23/09	33	2-4lb/10g	30	<5.00	<5.00
4/6/09	32	2-4lb/10g	38	5.8	<5.00
4/20/09	32	2-4lb/10g	243	8.5	<5.00
5/4/09	33	2-4lb/10g	343	8.2	8.7
5/18/09	33	2-4lb/10g	51	6.2	<5.00
6/8/09	35	2-4lb/10g	38	<5.00	<5.00
6/29/08	33	2-4lb/10g	25	9.1	<5.00
7/20/09	32	2-4lb/10g	47	39	<5.00
8/10/09	32	2-4lb/10g	23.7	31	<5.00
9/13/09	32	0	22	8	<5.00
10/12/09	32	0	104	21	<5.00
11/9/09	32	0	45	<50	<5.00
12/7/09	32	0	28	8.2	<5.00
1/10/10	32	0	42	13	<5.00
2/15/10	32	0	87	11.1	<5.00
3/15/10	32	0	35	<5.00	<5.00
4/15/10	32	0	40	9.62	<5.00
5/17/10	32	0	180	11	<5.00
6/13/10	32	0	43	15	<5.00
7/8/10	32	0	33	66	<2
8/19/10	0-20	0	17	16.3	<5.00
9/21/10	34	0	33	28.2	<5.00
10/18/10	37	0	20	14.9	<10.00
11/20/10	37	0	21	4.89	<4.00
12/16/10		0	23.55	6.15	<5.00

1/18/11	37	0	22.83	3.39	2.86
2/9/11	37	0	26.76	10.4	<10.0
3/17/11	37	0	49.03	14.2	<5.00
4/19/11	37	0	57.55	12.5	<5.00
5/2/11			310	11	
5/3/11			271	8.92	
5/4/11			156	10.8	
5/4/11			123	15.8	
5/5/11			83	18	
5/9/11	37	0	33.91	43.8	<5.00
6/9/11	0	0	6.8	52.4	<5.00
7/18/11	0	0	0.575	18.6	<5.00
8/15/11	0	0	1.004	38.9	<5.00
9/13/11	0	0	0.132	<5.00	<5.00
10/18/11		0	23.71	52.4	<5.00
11/16/11		0	29.64	30.6	<5.00
12/19/11		0	60.25	11.5	<5.00
1/19/12	40	0	31.82	<5.00	<5.00
2/14/12	40	0	40.38	6.68	<5.00
3/29/12	40	0	50.81	7.95	<5.00
4/18/12	40	0	22.54	20	<5.00
5/23/12	40	0	18.18	10.9	<5.00
6/11/12	40	0	17.87	7.13	<5.15
7/30/12	40	0	15.1	5.68	<5.00
8/24/12	40	0	13.75	<5.00	<5.00
9/24/12	0	0	0.4	73.2	<5.00
10/15/12	0	0	4.48	26.7	<5.00
11/19/12	0	0	0.73	28.8	<5.00
12/28/12	0	0	1.22	25	<1.00
1/16/13	0	0	3.72	40.5	2.12
2/24/13	0	0	4.1	45.3	<1.00
3/13/13	0	0	23	18.6	<1.00
4/22/13	0	0	21.62	26.7	<1.00
5/16/13	0	0	14.33	18.3	<1.00
6/21/13	0	0	1.44	22.3	<1.00
7/23/13	0	0	0.934	27.1	<1.00
8/23/13	0	0	5.27	65.4	<1.00
9/18/13	0	0	1.43	54.6	<1.00
10/16/13	0	0	1.63	66.1	<1.00
11/13/13	0	0	2.68	115	1.71
12/18/13	0	0	43.77	33	1.28
1/13/14	0	0	48.39	45.8	2.55
2/17/14	0	0	6.1	75.4	<1.00
3/17/14	0	0	151.5	12.8	2.47
4/23/14	0	0	11.26	49.4	<1.00
5/19/14	0	0	56.62	73.9	<1.00
6/4/14	0	0	2.45	65.7	<1.00
7/9/14	0	0	2.32	87.1	<1.00
8/14/14	0	0	0.26	47.6	<1.00
9/10/14	0	0	0.25	12.1	<1.00
10/22/14	0	0	2.02	137	<1.00
11/17/14	0	0	1.71	103	<1.00
12/16/14	0	0	13.86	45.9	<1.00
1/13/15	0	0	5.47	88.4	<1.00
2/11/15	0	0	2.29	118	<1.00

Weir Parameters			
pH	Temp	DO %	Distance
7.46	17.57	341.9	12
7.07	16.08	216.4	15
7.85	15.4	209.1	12
7.91	12.46	247.6	12
6.41	13.08	241.1	12
6.71	14.26	256.3	12
7.63	14.02	190.7	12
6.72	14.36	214.3	12
6.52	14.66	226.8	12
6.69	18.26	238	12
7.76	19.74	249.7	12
6.92	18.33	238.2	12
7.72	18.85	196.5	12
8.03	15.9	204.7	12
7.25	11.72	236.4	12
6.65	13.99	25.92*	12 measured as mg/L not as % DO
7.13	12.36	236.7	12
6.47	13.61	259.6	12
7.1	13.4	121.6	12 Very heavy flow rate
6.36	14.88	218.7	12
7.34	15.97	219.1	12
6.68	17.49	205.1	12
7.39	17.41	202	12
7.68	20.5	214.8	12
7.75	18.93	208.7	12
7.02	13.97	199.7	12
7.22	12.2	231.1	12
6.82	14	210.1	12
7.4	12.24	257.8	12
7.57	12.17	206.4	12

NOTES: Flow rates in gallons per minute (gpm)
O3 injection rates in pounds per 10 gallons
PCP concentrations in parts per billion (ppb)
NA - not analyzed
LE - Lab Error - samples not usable



11701 I-30 Bldg 1, Ste 115 - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

19 February 2015

Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221

RE: Arkwood Monthly Sampling
SDG Number: 1502169

Enclosed are the results of analyses for samples received by the laboratory on
12-Feb-15 09:30. If you have any questions concerning this report, please feel free to
contact me.

Sample Receipt Information:

Custody Seals	✓
Containers Correct	✓
COC/Labels Agree	✓
Received On Ice	✓
Temperature on Receipt	3.0°C

Sincerely,

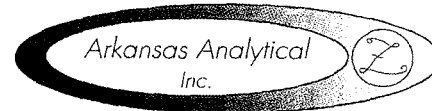
Norma James / Teresa Cains

Norma James
President

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19 February 2015

Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221
Project: Arkwood Monthly Sampling



Date Received: 12-Feb-15 09:30

CASE NARRATIVE

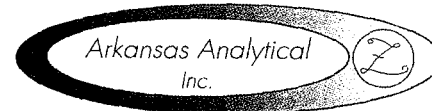
Sample Delivery Group – 1502169

One OR more of the qualifiers described below may appear in this report.

QUALITY CONTROL QUALIFIERS:

<u>Qualifier</u>	<u>Description</u>
E20	Sample used as "parent" for the associated analytical batch.
%D3/S-01 / E1	Surrogate failed to recover within acceptance criteria (%D3/S-01). Results associated with this surrogate were qualified as "estimated" (E1).
B	Present in the Associated Blank
B1	Present in Blank, but Not In the Sample.
%D2 / E5	Laboratory Control Spike (LCS) and/or Laboratory Control Spike Duplicate (LCSD) failed to recover with acceptance criteria (%D2). Associated results were qualified as "estimated" (E5).
%D1	Matrix Spike (MS) and/or Matrix Spike Duplicate (MSD) failed acceptance criteria.
MBA	Failed criteria due the high concentration of analyte in the parent sample.
MBI	Failed criteria due an interference in the parent sample.
%D3	Quality Control Surrogate failed acceptance criteria.
NREC	Quality Control Surrogate failed.

19 February 2015



Jim Flee
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221
Project: Arkwood Monthly Sampling

Date Received: 12-Feb-15 09:30

ANALYTICAL RESULTS

Lab Number: 1502169-01
Sample Name: Mouth
Date/Time Collected: 2/11/15 10:45
Sample Matrix: Water

<u>Semivolatiles</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Pentachlorophenol	ug/L	118		2/13/15 17:49	A502181	8270D, Rev 4, 2007
2,4,6-Tribromophenol [surr]	%	97.8		2/13/15 16:45	A502181	8270D, Rev 4, 2007
2-Fluorophenol [surr]	%	69.7		2/13/15 16:45	A502181	8270D, Rev 4, 2007
Phenol-d5 [surr]	%	50.0		2/13/15 16:45	A502181	8270D, Rev 4, 2007

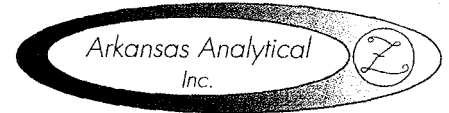
ANALYTICAL RESULTS

Lab Number: 1502169-02RE1
Sample Name: Weir
Date/Time Collected: 2/11/15 10:15
Sample Matrix: Water

<u>Semivolatiles</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Pentachlorophenol	ug/L	< 1.00	E1	2/18/15 16:42	A502181	8270D, Rev 4, 2007
2,4,6-Tribromophenol [surr]	%	82.7		2/18/15 16:42	A502181	8270D, Rev 4, 2007
2-Fluorophenol [surr]	%	25.5	%D3	2/18/15 16:42	A502181	8270D, Rev 4, 2007
Phenol-d5 [surr]	%	31.5		2/18/15 16:42	A502181	8270D, Rev 4, 2007

19 February 2015

Jim Fleer
Oxford Environmental & Safety, Inc
14348 Nieman Rd.
Overland Park, KS 66221
Project: Arkwood Monthly Sampling



Date Received: 12-Feb-15 09:30

QUALITY CONTROL RESULTS

Semivolatiles - Quality Control Analyzed: 13-Feb-15 14:59 By: KR

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch A502181 - EPA 3510C MS

Blank (A502181-BLK1)

Prepared & Analyzed: 13-Feb-15

Pentachlorophenol	ND	1.00	ug/L							
Surrogate: 2,4,6-Tribromophenol	37.7		"	40.0		94.1	33-148			
Surrogate: 2-Fluorophenol	29.4		"	40.0		73.5	42.5-82.1			
Surrogate: Phenol-d5	20.7		"	40.0		51.9	30-61			

LCS (A502181-BS1)

Prepared & Analyzed: 13-Feb-15

Pentachlorophenol	39.6	1.00	ug/L	40.0		99.0	56-118			
Surrogate: 2,4,6-Tribromophenol	39.9		"	40.0		99.8	66-132			
Surrogate: 2-Fluorophenol	28.1		"	40.0		70.2	41-72			
Surrogate: Phenol-d5	23.0		"	40.0		57.5	29-58			

Matrix Spike (A502181-MS1)

Source: 1502150-03

Prepared & Analyzed: 13-Feb-15

Pentachlorophenol	31.9	1.00	ug/L	40.0	1.25	76.6	59.5-122			
Surrogate: 2,4,6-Tribromophenol	30.5		"	40.0		76.2	55.9-134			
Surrogate: 2-Fluorophenol	17.9		"	40.0		44.8	17.1-87.4			
Surrogate: Phenol-d5	14.8		"	40.0		37.0	14.7-66.9			

Matrix Spike Dup (A502181-MSD1)

Source: 1502150-03

Prepared & Analyzed: 13-Feb-15

Pentachlorophenol	34.3	1.00	ug/L	40.0	1.25	82.7	59.5-122	7.28	8.94	
Surrogate: 2,4,6-Tribromophenol	30.0		"	40.0		75.1	55.9-134			
Surrogate: 2-Fluorophenol	17.7		"	40.0		44.2	17.1-87.4			
Surrogate: Phenol-d5	14.4		"	40.0		36.0	14.7-66.9			

QUALIFIER(S)

*%D3: Surrogate Percent Recovery Does Not Meet Laboratory Acceptance Criteria

*E1: Estimated Result Due to Surrogate Failure

All Analysis performed according to EPA approved methodology when available:

SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.

Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Reviewed by:

Norma James and/or Teresa Coins
Technical Director and/or QA Officer

CHAIN OF CUSTODY RECORD

[illegible]